

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

In re: BRUCE ALLEN RUSSELL

Chapter 13
Case No. 18-61226

Debtor

ABS REO TRUST V C/O SELECT PORTFOLIO
SERVICING, INC.

Plaintiff,

v.

Motion No. _____

BRUCE ALLEN RUSSELL

Defendant.

**ANSWER OF DEFENDANT TO PLAINTIFF'S MOTION FOR
ORDER GRANTING RELIEF FROM AUTOMATIC STAY**

COMES NOW the Defendant, Bruce Allen Russell, by counsel, pursuant to Rule 7012 of the Bankruptcy Rules, for the Defendant's answer states as follows:

1. Defendant hereby admits the allegations in paragraph 1 of Plaintiff's Motion.
2. Defendant hereby admits the allegations in paragraph 2 of Plaintiff's Motion.
3. Defendant hereby admits the allegations in paragraph 3 of Plaintiff's Motion.
4. Defendant hereby admits the allegations in paragraph 4 of Plaintiff's Motion.
5. Defendant hereby admits the allegations in paragraph 5 of Plaintiff's Motion.
6. Defendant hereby admits the allegations in paragraph 6 of Plaintiff's Motion.
7. Defendant hereby admits the allegations in paragraph 7 of Plaintiff's Motion.

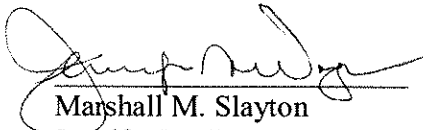
8. Defendant hereby denies the allegations in paragraph 8 of Plaintiff's Motion.
9. Defendant hereby denies the allegations in paragraph 9 of Plaintiff's Motion.
10. Defendant hereby denies the allegations in paragraph 10 of Plaintiff's Motion.
11. Defendant hereby admits the allegations in paragraph 11 of Plaintiff's Motion.
12. Defendant hereby denies the allegations in paragraph 12 of Plaintiff's Motion.
13. Defendant hereby denies the allegations in paragraph 13 of Plaintiff's Motion.
14. Defendant avers that he is current on the payments to Plaintiff and shall provide proof thereof prior to the hearing date.
15. Defendant hereby attaches the Respondent's Certification Required With Respect To Motion For Relief From Stay.

WHEREFORE, Defendant, BRUCE ALLEN RUSSELL, requests that the Motion be dismissed and that the Defendant be awarded the costs expended in this action.

Respectfully Submitted,

BRUCE ALLEN RUSSELL

By Counsel

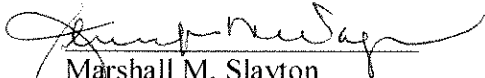


Marshall M. Slayton
Jennifer M. Wagoner
SLAYTON LAW, PLC
913 East Jefferson Street
Charlottesville, VA 22902
Counsel for Defendant(s)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Answer was sent via first-class mail, postage prepaid, to Debtor and via ECF to counsel for Plaintiff and the Trustee on

5/7/19.


Marshall M. Slayton
Jennifer M. Wagoner

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

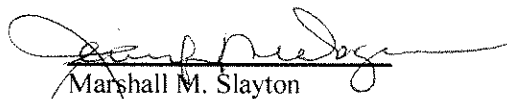
In re: BRUCE ALLEN RUSSELL DEBTOR	CASE NO. 18-61226 CHAPTER: 13
ABS REO TRUST V C/O SELECT PORTFOLIO SERVICING, INC. MOVANT v. BRUCE ALLEN RUSSELL RESPONDENT	

**RESPONDENT'S CERTIFICATION REQUIRED WITH
RESPECT TO MOTION FOR RELIEF FROM STAY**

1. If different from Movant's certification, description of property:
5132 W Old Mountain Rd.
Louisa VA, 23093
2. Respondent's valuation of property: **\$37,130.00**
Basis for such valuation: **Based on Brokers Price Opinion.**
Appraisal or other documentation of such valuation, if attached, is identified as Respondent's Exhibit A.

I HEREBY CERTIFY, as a Member of the Bar of this Court, that I represent the above-named Respondent and that the information contained herein is true according to the best of my knowledge and belief.

DATED: **05/07/2019**



Marshall M. Slayton
Jennifer M. Wagoner
913 E. Jefferson St, Charlottesville, VA 22902

***ALL BLANKS MUST BE COMPLETED. IF THE ANSWER IS NONE OR NOT APPLICABLE, PLEASE SO STATE.